

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

FULL CIRCLE UNITED, LLC,

Plaintiff,

v.

BAY TEK ENTERTAINMENT, INC.,

Defendant.

CASE NO. 1:20-CV-03395-BMC

**ORAL ARGUMENT REQUESTED**

BAY TEK ENTERTAINMENT, INC.,

Counterclaim Plaintiff,

v.

FULL CIRCLE UNITED, LLC,

Counterclaim Defendant,

and

ERIC PAVONY,

Additional Counterclaim  
Defendant.

**NOTICE OF MOTION *IN LIMINE* TO EXCLUDE ARGUMENT  
AND EVIDENCE TO THE EXTENT OFFERED TO RE-LITIGATE  
ISSUES ESTABLISHED AS A MATTER OF LAW**

PLEASE TAKE NOTICE that pursuant to Rules 401, 402, and 403 of the Federal Rules of Evidence and upon the accompanying Memorandum of Law and the Declaration of Mark C. Humphrey dated February 28, 2025 and exhibits appended thereto, and all prior pleadings and proceedings herein, Defendant and Counterclaim Plaintiff Bay Tek Entertainment, Inc. hereby

moves this Court to exclude arguments and evidence proffered by Plaintiff and Counterclaim Defendant Full Circle United, LLC that re-litigates issues established as a matter of law by this Court, and for such other further relief as the Court may deem just and proper.

DATED: New York, New York  
February 28, 2025

Respectfully submitted,  
Mitchell Silberberg & Knupp LLP

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